

Respectfully submitted,

/s/ Daniel R. Richards

Daniel R. Richards

State Bar No. 00791520

drichards@rrsfirm.com

Clark Richards

State Bar No. 90001613

crichards@rrsfirm.com

Albert A. Carrion, Jr.

State Bar No. 03883100

acarrion@rrsfirm.com

RICHARDS RODRIGUEZ & SKEITH, LLP

611 West 15th Street

Austin, Texas 78701

Telephone: (512) 476-0005

Facsimile: (512) 476-1513

ATTORNEYS FOR DEFENDANTS

CONCORDIA UNIVERSITY TEXAS, INC.,

DONALD CHRISTIAN AND CHRISTOPHER

BANNWOLF

CERTIFICATE OF CONFERENCE

I certify that on May 13, 2024, Clark Richards conferred with counsel for Plaintiff about the relief being sought in this motion and Plaintiff does not oppose this motion.

/s/ Daniel R. Richards

DANIEL R. RICHARDS

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May 2024, I electronically filed the above and foregoing document, which will send notification of such filing to:

Steven C. Levatino
Levatino & Pace PLLC
1101 S. Capital of Texas Hwy.
Bldg. K, Suite 125
Austin, Texas 78746
steven@lpfirm.com

Andrew F. MacRae
MacRae Law Firm PLLC
3267 Bee Cave Road
Suite 107, PMB 276
Austin, Texas 78746
andrew@macraelaw.com

Gregg R. Kronenberger
Kronenberger Law Firm, PLLC
1101 S. Capital of Texas Hwy.
Bldg. K, Suite 125
Austin, Texas 78746
gregg@gkronenberger.com

/s/ Daniel R. Richards

DANIEL R. RICHARDS